

DECLARATION OF R.A.

I, R.A., declare:

3 1. I have personal knowledge of the facts set forth in this declaration. If called
4 upon to testify as a witness, I could do so and would testify to these facts.

5 2. I am a citizen of Nepal. As a child, I moved with my parents to Guam. After
6 TPS was designated for Nepal in 2015, we applied for and received TPS. I came to the
7 United States in 2016, when I was 16 years old. I am now 26, and have been in the U.S. for
8 nine years. My mother also resides in the U.S. and is a TPS recipient.

9 3. I am a member of the National TPS Alliance, and joined voluntarily because
10 I believe in the mission of the organization to defend the TPS program.

11 4. After we arrived in the United States, my family settled in San Francisco. I
12 attended high school there and graduated in 2018.

13 5. I applied to colleges and I was accepted to U.C. Davis, which was my dream
14 school. I happily accepted, and was in the process of looking for a dorm room. Then, I
15 learned that because I was on TPS, I did not qualify for any federal aid. I remember
16 sobbing on the street when I found out that I was not eligible for financial aid. There was
17 no way my working-class family could afford to pay tuition out-of-pocket. I felt like my
18 dreams of going to medical school were crushed.

19 6. Instead, I enrolled in City College of San Francisco. I worked several jobs
20 throughout college, including as a patient coordinator at U.C. San Francisco hospital. I was
21 working there in 2020, when the COVID pandemic hit. I was a front-line worker,
22 screening patients for symptoms of COVID and transporting people with potential COVID
23 infections to a quarantine area. At the time, I lived in a small studio apartment with my
24 mom. It was a scary time, because I knew that we were both at risk. Thankfully, I was one
25 of the first people in San Francisco to receive a vaccine.

26 7. In 2021, I graduated with three separate associate's degrees in biological
27 science, behavioral and social science, and science and mathematics. I was also working
28 full-time at UCSF as a patient navigator/clinical trial coordinator for an international

1 program. The research program I worked for was an international clinical trial for pediatric
2 neuro-oncology – treating children with brain cancer. Our patients and their families came
3 from all over the world. My job was to be the point of contact for prospective patients and
4 to gather their medical records, insurance information, and schedule their care. It was an
5 invaluable learning experience, but it was also extraordinarily sad. Still, I felt good about
6 helping people in such difficult circumstances. I hoped that my experience with such a
7 specialized medical field would help me secure permanent immigration status, and I
8 remember feeling hopeful about my future.

9 8. As time went on, I realized that my dream of becoming a medical doctor was
10 going to be much more difficult due to my immigration status and the lack of availability
11 of student aid. I decided instead to pursue nursing, with the goal of getting a job that would
12 be meaningful and help people, and that might also be able to sponsor me for a green card.

13 9. In 2022, I moved to Texas and enrolled in an accelerated bachelor's in
14 nursing program. I graduated in December 2023, and began working at my current job. I
15 am a labor and delivery nurse at a hospital in Austin, Texas. I absolutely love my job.
16 Helping mothers deliver their babies is so gratifying. It is an honor to be present for one of
17 the most important moments in people's lives. I work on level 4, which means that there
18 are usually one or more complications present. My job requires me to be on my toes at all
19 times.

20 10. When I was hired, my employer agreed to sponsor me for an EB-3 green
21 card for skilled workers. One of the conditions of the application is that I maintain lawful
22 status and employment authorization until the time that my application for adjustment of
23 status is granted. The paperwork was submitted in 2024, and is still pending.

24 11. However, with the termination of TPS, I stand to lose everything. Without
25 TPS, I will have no status or work authorization. Aside from losing my job and my
26 income, without lawful status, I will become ineligible for the employment-based green
27 card. I asked my employer if it was possible to leave the country and wait for the
28 application to be processed. They told me no, and that if I leave the country my application

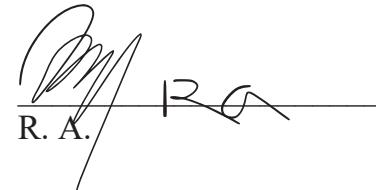
1 will be considered abandoned. I don't know what to do. I have worked so hard for so many
2 years, doing difficult, intense work, all with the hopes that I would be able to contribute to
3 society and also qualify myself for permanent status in the only country that feels like
4 home to me. It is absolutely heartbreaking to be faced with the loss of everything I have
5 worked to achieve.

6 12. I was recently diagnosed with depression. Over the past few months, with all
7 of the anti-immigrant sentiment and TPS being terminated, my depression has gotten much
8 worse. Some days, I feel like my life is over. My mental health has suffered so much that I
9 began taking anti-depressants for the first time a couple of months ago.

10 13. I want to participate in this lawsuit and share my story because I know that
11 there are so many other young people struggling due to their immigration status. I feel like
12 I need to speak out for other people who are feeling hopeless in the face of all the
13 uncertainty and fear. At the same time, I worry about becoming a target for deportation or
14 detention if I speak out. For this reason, I chose not to put my full name on this
15 declaration, even though I would have liked to do so. I hope my story makes a difference.
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17 I declare under penalty of perjury that the foregoing is true and correct, and that this
18 declaration was executed in Austin, Texas this 30th day of June, 2025.

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R. A.